UNITED STATES BANKRUPTCY COURT DISTRICT OF SOUTH DAKOTA

| In re: | |) | Bankr. Case No. 13-10118 |
|-------------------------------|---------|---|-------------------------------|
| | |) | |
| Northern Beef Packers Limited | |) | Chapter 7 |
| Partnership | |) | |
| Tax Id/EIN 26-2530200 | |) | MOTION TO EXTEND DEADLINE FOR |
| | |) | OBJECTIONS TO FEE APPLICATION |
| | |) | |
| | Debtor. |) | |

Forrest C. Allred, Chapter 7 trustee, hereby moves the court for its order extending the deadline described below, and represents to the court:

- 1. On May 28, 2015, counsel for Debtor filed a final fee application (doc. 1195).
- 2. On July 1, 2015, the court entered its order (doc. 1241) approving the application in part and extending to August 3, 2015, the time for objecting to the balance of the application.
- 3. Movant filed an application to employ counsel (bankr. doc. 1236); however, an objection was filed (bankr. doc. 1244) and a telephonic hearing on the application has been set for July 30, 2015 (bankr. doc.1247). In the event an evidentiary hearing is needed, a further hearing would be required.
- 4. It is likely the application to employ counsel will be revised, or withdrawn and a new application re-submitted.
- 5. Because of the foregoing circumstances, there is not enough time remaining for counsel for Movant to respond by the deadline of August 3, 2015.
- 6. Movant therefore respectfully moves the court to extend the deadline for objecting to the balance of the fee application to a time not earlier than October 15, 2015.

DATED this 22nd day of July, 2015.

/s/ Forrest C. Allred

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